

October 27, 2005

Via E-Mail

Ms. Barbara Sieminski California Regional Water Quality Control Board San Francisco Bay Region 1515 Clay St. Suite 1400 Oakland, CA 94612

Re: Site Status Update

Crossroads (Former Montgomery Ward) and CCC Associates Sites

2302 and 2320-2344 Monument Boulevard

Pleasant Hill, California (File Nos. 07S0104 and 07S0171)

Dear Barbara:

On June 8, 2005, on behalf of ICI Development Company (ICI)/PH Holdings, L.P. (collectively "Client"), ENVIRON International Corporation (ENVIRON) submitted to the California Regional Water Quality Control Board – San Francisco Bay Region (Regional Board) a status report regarding site conditions at the former Montgomery Ward site, Contra Costa County, Pleasant Hill, California. The site is now known as The Crossroads at Pleasant Hill (hereafter "the Crossroads site"). That report included a section on the status of the CCC Associates property (CCC site) located immediately south, and hydraulically upgradient, of the Crossroads site, where the former Cleanco Dry Cleaners operated from 1967, or earlier, until 1984 in Suites 2320 and 2334. According to Client, closing of escrow for the acquisition of the CCC site by Client is scheduled for November 1, 2005.

This site status update summarizes the activities conducted by ENVIRON since June 2005 at the Crossroads and CCC sites.

A. Work Completed Between June and October 2005

The Crossroads Site

ENVIRON abandoned the three existing ground water monitoring wells (Wells LF1, ENSR-MW5, and GWENV-4), and installed new wells at nine locations labeled E-1 through E-9 (see Figure 1). At each location, dual wells were installed. At each dual well location, screens were placed in two adjacent borings at two different depth intervals (generally from 10 to 15 feet below ground surface and from 20 to 30 feet below ground surface). Each dual well was labeled with a single well number and using Postfixes A and B to refer to the shallower and deeper ground water zones, respectively. Field activities related to the abandonment of the three former

wells and the installation, surveying, and development of the eighteen new wells were performed between September 2 and October 26, 2005.

The CCC Site

Between June 14 and 23, 2005, ENVIRON advanced 9 soil borings at the CCC site. Three soil samples were collected from each soil boring from depths of 2, 5, and 10 feet below ground surface. Additionally, a soil sample was collected from a depth of 0.5 foot below ground surface for purposes of conducting a future human health risk assessment (HHRA) at the site. Between June 14 and 16, ENVIRON collected three grab ground water samples from the bottom of three of the soil borings.

Between June 22 and 24, ENVIRON installed ground water monitoring wells at four locations at the CCC site, labeled Wells MW-4 though MW-7 (see Figure 2). At each well location, dual wells were installed. At each dual well location, screens were placed in two adjacent borings at two different depth intervals (generally from 13 to 18 feet below ground surface and from 20 to 30 feet below ground surface). Each dual well was labeled with a single well number and using Postfixes A and B to refer to the shallower and deeper ground water zones, respectively. These wells were surveyed and developed on June 28 and 29.

The results of the soil samples showed that the highest reported concentrations of volatile organic compounds (VOCs) in soil included 147 micrograms per kilogram (μ g/kg) of tetrachloroethene (PCE) in one sample and 34.6 μ g/kg of cis-1,2-dichloroethene (cis-1,2-DCE) in another sample. The results of the grab ground water samples showed that the highest reported concentrations of the VOCs in ground water included 26.6 micrograms per liter (μ g/l) of PCE in one boring; and 25.3 μ g/l of trichloroethene (TCE), 17.8 μ g/l of cis-1,2-DCE, and 2.3 μ g/l of trans-1,2-dichloroethene (trans-1,2-DCE) in another boring

On August 31, 2005, ENVIRON sampled the old and new wells at the CCC site. The results are summarized in Table 1. The results showed that the highest VOC concentrations were reported for Wells MW-1 (69.2 μ g/l of PCE, 12.7 μ g/l of TCE, and 14.4 μ g/l of cis-1,2-DCE), MW-6A (26.9 μ g/l of PCE, 48.2 μ g/l of TCE, and 69.6 μ g/l of cis-1,2-DCE PC), and MW-7A (41.3 μ g/l of PCE, 23.8 μ g/l of TCE, and 33.1 μ g/l of cis-1,2-DCE).

B. Tasks Scheduled for November and December 2005

The Crossroads Site

ENVIRON plans to sample the eighteen new wells at the Crossroads site in November 2005. The collected ground water samples will be analyzed, as follows:

- All collected ground water samples, for VOCs by the United States Environmental Protection Agency (USEPA) Method 8260B;
- All collected ground water samples, for total petroleum hydrocarbons as diesel fuel (TPHd) and as heavy range hydrocarbons (TPHh) by USEPA Method 8015D Modified; and

 Collected ground water samples from Wells E-1, E-5, E-6, and E-7, both Zones A and B, for total petroleum hydrocarbons as gasoline and light range hydrocarbons (TPHg) by USEPA Method 8015G Modified

The CCC Site

According to Client, Keys Pool is scheduled to vacate Suite 2320 on or before December 1, 2005. Following the evacuation of Suite 2320, ENVIRON plans to advance three soil borings in that suite and one soil boring in Suite 2334 (currently occupied by Exotic Birds). The three borings within Suite 2320 will be advanced into the saturated zone to a depth of between approximately 15 and 20 feet below ground surface. Soil samples will be collected from depths of 2, 5, and 10 feet below ground surface and grab ground water samples will be collected via HydroPunch or installation of temporary wells. For the temporary wells, approximately 5-footlong screens will be installed at the bottom of the borings prior to sample collection. Because of potential excessive disturbance to the birds in the Exotic Birds suite, ENVIRON will only use hand augering to advance the planned boring in Suite 2334 to a maximum depth of 10 feet below ground surface.

The Crossroads and CCC Sites

ENVIRON plans to complete a feasibility study for both the Crossroads and CCC sites to address the ground water under the areas of these two sites with identified ground water impact. As part of this task, ENVIRON is planning a field pilot study using sodium permanganate. The results of the pilot test will be used to evaluate the potential effectiveness of sodium permanganate oxidation technology to mitigate the VOCs present in ground water at both sites.

C. Closure

As always, ENVIRON appreciates your cooperation and assistance in providing timely oversight for this project. We will call you to enquire if you have any questions or comments regarding this report.

Sincerely,

Houshang Dezfulian, Ph.D., P.E.

Principal

No. 34560 Eddie Arslanian, P.E. Manager

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Enclosures: Table 1; Figures 1 and 2.

Copy: Mr. Dan Wojkowski – ICI Development Company (via e-mail)

Table 1 - Ground Water Sampling Results (August 31, 2005) The CCC Site, 2320-2344 Monument Boulevard, Pleasant Hill, California

Volatile Organic Compounds by USEPA Method 8260B:

Sample ID	Units	MW-1	MW-2	MW-3	MW-4A	MW-4A-D	MW-4B	MW-5A	MW-5B	MW-6A	MW-6B	MW-7A	MW-7B	TRIP BLANK
Sample Date		8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005	8/31/2005
Acetone	ug/L	ND<10	ND<10	ND<10	33.5	28.0	ND<10							
2-Butanone (MEK)	ug/L	ND<5.0	ND<5.0	ND<5.0	21.1	19.5	ND<5.0							
cis-1,2-Dichloroethene	ug/L	14.4	1.3	ND<0.5	4.1	4.2	ND<0.5	ND<0.5	ND<0.5	69.6	11.0	33.1	ND<0.5	ND<0.5
trans-1,2-Dichloroethene	ug/L	1.0	ND<0.5	6.3	1.3	2.0	ND<0.5	ND<0.5						
Tetrachloroethene	ug/L	69.2	138	ND<0.5	19.6	21.0	ND<0.5	ND<0.5	ND<0.5	26.9	113	41.3	42.6	ND<0.5
Trichloroethene	ug/L	12.7	18.6	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5	48.2	31.4	23.8	9.5	ND<0.5



